

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

FILED

MAY 12 2020

UNITED STATES OF AMERICA

v.

YEN CHAM YUNG

THOMAS G. BRUTON  
CLERK, U.S. DISTRICT COURT  
CASE NUMBER:

UNDER SEAL 20 CR

231

**GOVERNMENT'S MOTION TO SEAL  
COMPLAINT, AFFIDAVIT, AND ARREST WARRANT**

Now comes the UNITED STATES OF AMERICA, by JOHN R. LAUSCH, JR.,  
United States Attorney for the Northern District of Illinois, and states as follows in  
support of its Motion to Seal Complaint, Affidavit, and Arrest Warrant:

The public filing of the Complaint, Affidavit, and Arrest Warrant in this matter  
before the arrest warrant can be executed could alert the defendant and result in his  
flight and the destruction of evidence.

For this reason, the government respectfully requests that the Complaint,  
Affidavit, and Arrest Warrant, as well as this Motion to Seal, be sealed until the time  
of arrest of the defendant in this case or further order of the Court, whichever occurs  
earlier.

DATE: May 12, 2020

Respectfully submitted,

JOHN R. LAUSCH, JR.  
United States Attorney

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